

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: § Case No. 22-60043
FREE SPEECH SYSTEMS, LLC, § Chapter 11 (Subchapter V)
Debtor §

**MOTION TO WITHDRAW AS COUNSEL
FOR CONNECTICUT PLAINTIFFS¹**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

TO THE HONORABLE CHRISTOPHER LOPEZ, U.S. BANKRUPTCY JUDGE:

Byman & Associates PLLC, along with its individual attorney, Randy W. Williams (collectively, Movant), files this Motion to Withdraw as Counsel for Connecticut Plaintiffs, and respectfully shows:

¹ Connecticut Plaintiffs are David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker.

1. Free Speech Systems, LLC filed its voluntary petition for bankruptcy protection on July 29, 2022 [Dkt. 1].

2. On July 31, 2022, Movant filed a Notice of Appearance and Request for Service [Dkt. 13].

3. Movant notified Connecticut Plaintiffs of its intent to seek withdrawal as counsel.

4. Ryan E. Chapple and the law firm of Cain & Skarnulis PLLC will continue its representation of Connecticut Plaintiffs as lead counsel of record.

5. For the reasons stated, Movant respectfully requests this Court grant this Motion to Withdraw as Counsel for Connecticut Plaintiffs. Movant's individual attorney respectfully requests that he be removed from this Court's CM/ECF notification system as counsel for Connecticut Plaintiffs. Movant further requests such other and further relief to which it may be justly entitled to receive.

Respectfully submitted this 20th day of October 2022.

/s/ Ryan E. Chapple
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**WITHDRAWING ATTORNEY FOR
CONNECTICUT PLAINTIFFS**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Withdraw as Counsel has been served on counsel for Debtor, Debtor, the Subchapter V Trustee, the U.S. Trustee, as well as all parties receiving or entitled to notice through CM/ECF and in accordance with the Rules on this 20th day of October 2022.

/s/ Ryan E. Chapple
Ryan E. Chapple